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 CARE, P.C. and OMAR F. AHMED, M.D.*

UNITED STATES DISTRICT COURT  
 EASTERN DISTRICT OF NEW YORK

|                                      |                            |
|--------------------------------------|----------------------------|
| .....X                               |                            |
| GOVERNMENT EMPLOYEES INSURANCE       | :                          |
| COMPANY, GEICO INDEMNITY COMPANY,    | :                          |
| GEICO GENERAL INSURANCE COMPANY, and | :                          |
| GEICO CASUALTY COMPANY               | :                          |
|                                      | Docket No.1:20-cv-01214    |
|                                      | (RRM)(SMG)                 |
| <i>Plaintiff,</i>                    | :                          |
|                                      | :                          |
| <i>-against-</i>                     | :                          |
|                                      | <b>ANSWER TO COMPLAINT</b> |
| NORTHERN MEDICAL CARE, P.C.,         | :                          |
| OMAR F. AHMED, M.D.,                 | :                          |
| QUEENS WELLNESS MEDICAL, P.C.,       | :                          |
| MADHU BABU BOPPANA, M.D.,            | :                          |
| RESTOTALIGN CHIROPRACTIC, P.C.,      | :                          |
| DAVOD S. KRASNER, D.C.,              | :                          |
| WEI DAO ACUPUNCTURE, P.C.,           | :                          |
| BORUCH LAOSN, INC., and              | :                          |
| IGOR MAYZZENBERG, L.AC.              | :                          |
| <i>Defendants</i>                    |                            |

.....X

Defendants NORTHERN MEDICAL CARE, P.C. AND OMAR F. AHMED, M.D., by their attorneys ZIMMERMAN LAW, P.C. as and for their Answer to the complaint herein allege as follows upon information and belief:

# **NATURE OF ACTION**

1. Defendants admit that, by virtue of the pleaded claims in the Complaint, Plaintiffs purport to seek damages as alleged in paragraph 1. Defendants admit that NORTHERN MEDICAL CARE, P.C. (hereinafter “NORTHERN”) is a professional corporation. Defendants deny all other allegations in paragraph 1.

2. The defendants deny the allegations in paragraph 2 of the complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

3. The defendants deny the allegations in paragraph 3 of the complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

4. The defendants deny the allegations in paragraph 4 of the complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

5. Defendants admit that by virtue of the pleaded claims, plaintiffs seek to recover monies that have been paid to defendants in the sum of \$3,161,000.00 and except as expressly admitted herein deny all other allegations in paragraph 5, 5(i), 5(ii) and 5(iii).

6. Defendants deny the allegations in paragraph 6(i); deny the allegations in paragraph 6(ii) except that defendant OMAR F. AHMED, M.D. is a physician licensed to practice medicine in the State of New York; 6(iii) and 6(iv) deny knowledge or information sufficient to form a belief as to the balance of allegations contained in this paragraph.

7. The defendants deny the allegations in paragraph 7 of the complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

8. The defendants deny the allegations in paragraph 8 of the complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

9. The defendants deny the allegations in paragraph 9 of the complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

10. The defendants deny the allegations in paragraph 10 of the complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

### **THE PARTIES**

11. The defendants admit the allegation in paragraph 11 of the complaint.

12. The defendants admit that Northern Medical Care, P.C. was organized on August 6, 2014 July 26, 2017 and was doing business as a duly authorized domestic professional services corporation. Except as expressly admitted herein, the defendants deny all other allegations in paragraph 12 of the complaint.

13. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 13.

14. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 14.

15. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 15.

16. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 16.

17. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 17.

18. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 18.

19. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 19.

20. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 20.

### **JURISDICTION AND VENUE**

21. Defendants admit that, by virtue of the pleaded bases of Jurisdiction and Venue, this court has jurisdiction over the claims in this matter and that venue is proper. Except as expressly admitted herein, Defendants deny all other allegations in paragraphs numbered 21, 22, and 23 of the complaint, and, more specifically deny that the defendants engaged in any conduct that constitutes a violation of 18 USC §§1961 et seq, the Racketeer Influenced and Corrupt Organization Act (“RICO”) or New York Law. Defendants admit that one or more defendants reside in and that the business of NORTHERN is in the Eastern District.

### **ALLEGATIONS COMMON TO ALL CLAIMS**

22. The Answering Defendants neither admit or deny the allegations contained in paragraph 24 of the Plaintiffs’ Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker’s Compensation Fee Schedule.

23. The Answering Defendants neither admit or deny the allegations contained in paragraph 25 of the Plaintiffs’ Complaint as the allegations purport to interpret New York

State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

24. The Answering Defendants neither admit or deny the allegations contained in paragraph 26 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

25. The Answering Defendants neither admit nor deny the allegations contained in paragraph 27 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule

26. The Answering Defendants neither admit nor deny the allegations contained in paragraph 28 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

27. The Answering Defendants neither admit nor deny the allegations contained in paragraph 29 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

28. The Answering Defendants neither admit nor deny the allegations contained in paragraph 30 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

29. The Answering Defendants neither admit nor deny the allegations contained in paragraph 31 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

30. The Answering Defendants neither admit nor deny the allegations contained in paragraph 32 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

31. The Answering Defendants neither admit nor deny the allegations contained in paragraph 33 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

32. The Answering Defendants neither admit nor deny the allegations contained in paragraph 34 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

33. The Answering Defendants neither admit nor deny the allegations contained in paragraph 35 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

34. The Answering Defendants neither admit nor deny the allegations contained in paragraph 36 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

35. The Answering Defendants neither admit nor deny the allegations contained in paragraph 37 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

36. The Answering Defendants neither admit nor deny the allegations contained in paragraph 38 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

37. The Answering Defendants neither admit nor deny the allegations contained in paragraph 39 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

38. The Answering Defendants neither admit nor deny the allegations contained in paragraph 40 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

39. The Answering Defendants neither admit nor deny the allegations contained in paragraph 41 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

40. The Answering Defendants deny the allegations contained in paragraph 42 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

41. The Answering Defendants deny the allegations contained in paragraph 43 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

42. The Answering Defendants deny the allegations contained in paragraph 44 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

43. The Answering Defendants deny the allegations contained in paragraph 45 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.



44. The Answering Defendants deny the allegations contained in paragraph 46 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

45. The Answering Defendants deny the allegations contained in paragraph 47 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

46. The Answering Defendants deny the allegations contained in paragraph 48 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

47. The Answering Defendants deny the allegations contained in paragraph 49 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

48. The Answering Defendants deny the allegations contained in paragraph 50 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

49. The Answering Defendants deny the allegations contained in paragraph 51 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

50. The Answering Defendants deny the allegations contained in paragraph 52 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

51. The Answering Defendants deny the allegations contained in paragraph 53 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

52. The Answering Defendants deny the allegations contained in paragraph 54 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

53. The Answering Defendants deny the allegations contained in paragraph 55 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

54. The Answering Defendants deny the allegations contained in paragraph 56 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

55. The Answering Defendants deny the allegations contained in paragraph 57 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

56. The Answering Defendants deny the allegations contained in paragraph 58 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

57. The Answering Defendants deny the allegations contained in paragraph 59 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

58. The Answering Defendants deny the allegations contained in paragraph 60 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

59. The Answering Defendants deny the allegations contained in paragraph 61 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

60. The Answering Defendants deny the allegations contained in paragraph 62 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

61. The Answering Defendants deny the allegations contained in paragraph 63 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

62. The Answering Defendants deny the allegations contained in paragraph 64 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

63. The Answering Defendants deny the allegations contained in paragraph 65 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

64. The Answering Defendants deny the allegations contained in paragraph 66 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

65. The Answering Defendants deny the allegations contained in paragraph 67 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

66. The Answering Defendants deny the allegations contained in paragraph 68 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

67. The Answering Defendants deny the allegations contained in paragraph 69 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

68. The Answering Defendants deny the allegations contained in paragraph 70 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

69. The Answering Defendants deny the allegations contained in paragraph 71 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

70. The Answering Defendants deny the allegations contained in paragraph 72 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

71. The Answering Defendants deny the allegations contained in paragraph 73 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

72. The Answering Defendants deny the allegations contained in paragraph 74 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

73. The Answering Defendants deny the allegations contained in paragraph 75 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

74. The Answering Defendants deny the allegations contained in paragraph 76 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

75. The Answering Defendants deny the allegations contained in paragraph 77 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

76. The Answering Defendants deny the allegations contained in paragraph 78 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

77. The Answering Defendants deny the allegations contained in paragraph 79 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

78. The Answering Defendants deny the allegations contained in paragraph 80 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

79. The Answering Defendants deny the allegations contained in paragraph 81 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

80. The Answering Defendants deny the allegations contained in paragraph 82 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

81. The Answering Defendants deny the allegations contained in paragraph 83 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

82. The Answering Defendants deny the allegations contained in paragraph 84 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

83. The Answering Defendants deny the allegations contained in paragraph 85 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

84. The Answering Defendants deny the allegations contained in paragraph 86 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

85. The Answering Defendants deny the allegations contained in paragraph 87 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

86. The Answering Defendants deny the allegations contained in paragraph 88 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

87. The Answering Defendants deny the allegations contained in paragraph 89 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

88. The Answering Defendants deny the allegations contained in paragraph 90 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

89. The Answering Defendants deny the allegations contained in paragraph 91 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

90. The Answering Defendants deny the allegations contained in paragraph 92 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

91. The Answering Defendants deny the allegations contained in paragraph 93 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

92. The Answering Defendants deny the allegations contained in paragraph 94 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

93. The Answering Defendants deny the allegations contained in paragraph 95 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The



Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

94. The Answering Defendants deny the allegations contained in paragraph 96 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

95. The Answering Defendants deny the allegations contained in paragraph 97 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

96. The Answering Defendants deny the allegations contained in paragraph 98 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

97. The Answering Defendants deny the allegations contained in paragraph 99 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

98. The Answering Defendants deny the allegations contained in paragraph 100 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

99. The Answering Defendants deny the allegations contained in paragraph 101 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

100. The Answering Defendants deny the allegations contained in paragraph 102 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

101. The Answering Defendants deny the allegations contained in paragraph 103 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

102. The Answering Defendants deny the allegations contained in paragraph 104 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

103. The Answering Defendants deny the allegations contained in paragraph 105 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

104. The Answering Defendants deny the allegations contained in paragraph 106 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

105. The Answering Defendants deny the allegations contained in paragraph 107 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

106. The Answering Defendants deny the allegations contained in paragraph 108 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

107. The Answering Defendants deny the allegations contained in paragraph 109 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

108. The Answering Defendants deny the allegations contained in paragraph 130 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

109. The Answering Defendants deny the allegations contained in paragraph 131 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

110. The Answering Defendants deny the allegations contained in paragraph 132 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

111. The Answering Defendants deny the allegations contained in paragraph 133 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

112. The Answering Defendants deny the allegations contained in paragraph 134 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The

Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

113. The Answering Defendants deny the allegations contained in paragraph 135 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

114. The Answering Defendants deny the allegations contained in paragraph 136 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

115. The Answering Defendants deny the allegations contained in paragraph 137 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

116. The Answering Defendants deny the allegations contained in paragraph 138 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

117. The Answering Defendants deny the allegations contained in paragraph 139 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

118. The Answering Defendants deny the allegations contained in paragraph 140 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

119. The Answering Defendants deny the allegations contained in paragraph 141 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

120. The Answering Defendants deny the allegations contained in paragraph 142 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

121. The Answering Defendants deny the allegations contained in paragraph 143 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

122. The Answering Defendants deny the allegations contained in paragraph 144 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

123. The Answering Defendants neither admits nor denies the allegations contained in paragraph 145 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

124. The Answering Defendants deny the allegations contained in paragraph 146 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

125. The Answering Defendants neither admits nor denies the allegations contained in paragraph 147 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

126. The Answering Defendants deny the allegations contained in paragraph 148 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

127. The Answering Defendants deny the allegations contained in paragraph 149 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

128. The Answering Defendants deny the allegations contained in paragraph 150 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

129. The Answering Defendants deny the allegations contained in paragraph 151 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

130. The Answering Defendants deny the allegations contained in paragraph 152 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph

131. The Answering Defendants deny the allegations contained in paragraph 153 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph

132. The Answering Defendants deny the allegations contained in paragraph 154 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph

133. The Answering Defendants deny the allegations contained in paragraph 155 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

134. The Answering Defendants deny the allegations contained in paragraph 156 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

135. The Answering Defendants deny the allegations contained in paragraph 157 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

136. The Answering Defendants neither admits nor denies the allegations contained in paragraph 158 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule

137. The Answering Defendants deny the allegations contained in paragraph 159 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

138. The Answering Defendants deny the allegations contained in paragraph 160 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

139. The Answering Defendants deny the allegations contained in paragraph 161 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

140. The Answering Defendants neither admit or deny the allegations contained in paragraph 162 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-Fault laws and regulations and/or the Worker's Compensation Fee Schedule.

141. The Answering Defendants deny the allegations contained in paragraph 163 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

142. The Answering Defendants deny the allegations contained in paragraph 164 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

143. The Answering Defendants deny the allegations contained in paragraph 165 of the



Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

144. The Answering Defendants deny the allegations contained in paragraph 166 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

145. The Answering Defendants neither admit or deny the allegations contained in paragraph 167 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-Fault laws and regulations and/or the Worker's Compensation Fee Schedule.

146. The Answering Defendants deny the allegations contained in paragraph 168 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

147. The Answering Defendants deny the allegations contained in paragraph 169 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

148. The Answering Defendants deny the allegations contained in paragraph 170 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

149. The Answering Defendants deny the allegations contained in paragraph 171 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations

contained in this paragraph.

150. The Answering Defendants neither admit or deny the allegations contained in paragraph 172 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-Fault laws and regulations and/or the Worker's Compensation Fee Schedule.

151. The Answering Defendants deny the allegations contained in paragraph 173 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

152. The Answering Defendants deny the allegations contained in paragraph 174 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

153. The Answering Defendants deny the allegations contained in paragraph 175 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

154. The Answering Defendants deny the allegations contained in paragraph 176 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

155. The Answering Defendants deny the allegations contained in paragraph 177 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

156. The Answering Defendants deny the allegations contained in paragraph 178 of the

Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

157. The Answering Defendants deny the allegations contained in paragraph 179 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

158. The Answering Defendants deny the allegations contained in paragraph 180 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

159. The Answering Defendants deny the allegations contained in paragraph 181 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

160. The Answering Defendants neither admit or deny the allegations contained in paragraph 182 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-Fault laws and regulations and/or the Worker's Compensation Fee Schedule.

161. The Answering Defendants deny the allegations contained in paragraph 183 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

162. The Answering Defendants deny the allegations contained in paragraph 184 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations

contained in this paragraph.

163. The Answering Defendants neither admit or deny the allegations contained in paragraph 185 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-Fault laws and regulations and/or the Worker's Compensation Fee Schedule.

164. The Answering Defendants deny the allegations contained in paragraph 186 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

165. The Answering Defendants deny the allegations contained in paragraph 187 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

166. The Answering Defendants deny the allegations contained in paragraph 188 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

167. The Answering Defendants deny the allegations contained in paragraph 189 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

168. The Answering Defendants deny the allegations contained in paragraph 190 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

169. The Answering Defendants deny the allegations contained in paragraph 191 of the

Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

170. The Answering Defendants deny the allegations contained in paragraph 192 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

171. The Answering Defendants deny the allegations contained in paragraph 193 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

172. The Answering Defendants deny the allegations contained in paragraph 194 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

173. The Answering Defendants deny the allegations contained in paragraph 195 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

174. The Answering Defendants deny the allegations contained in paragraph 196 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

175. The Answering Defendants deny the allegations contained in paragraph 197 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations

contained in this paragraph.

176. The Answering Defendants deny the allegations contained in paragraph 198 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

177. The Answering Defendants deny the allegations contained in paragraph 199 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

178. The Answering Defendants deny the allegations contained in paragraph 200 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

179. The Answering Defendants deny the allegations contained in paragraph 201 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

180. The Answering Defendants deny the allegations contained in paragraph 202 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

181. The Answering Defendants deny the allegations contained in paragraph 203 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

182. The Answering Defendants deny the allegations contained in paragraph 204 of the

Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

183. The Answering Defendants deny the allegations contained in paragraph 205 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

184. The Answering Defendants deny the allegations contained in paragraph 206 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

185. The Answering Defendants deny the allegations contained in paragraph 207 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

186. The Answering Defendants neither admit nor deny the allegations contained in paragraph 208 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

187. The Answering Defendants neither admit nor deny the allegations contained in paragraph 209 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines

188. The Answering Defendants neither admit nor deny the allegations contained in paragraph 210 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

189. The Answering Defendants neither admit nor deny the allegations contained in paragraph 211 of the Plaintiffs' Complaint as the allegations purport to expound and interpret

medical, scientific and/or clinical information and guidelines.

190. The Answering Defendants neither admit nor deny the allegations contained in paragraph 212 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

191. The Answering Defendants neither admit nor deny the allegations contained in paragraph 213 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

192. The Answering Defendants deny the allegations contained in paragraph 214 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

193. The Answering Defendants deny the allegations contained in paragraph 215 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

194. The Answering Defendants deny the allegations contained in paragraph 216 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

195. The Answering Defendants deny the allegations contained in paragraph 217 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

196. The Answering Defendants deny the allegations contained in paragraph 218 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations



contained in this paragraph.

197. The Answering Defendants deny the allegations contained in paragraph 219 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

198. The Answering Defendants deny the allegations contained in paragraph 220 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

199. The Answering Defendants deny the allegations contained in paragraph 221 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

200. The Answering Defendants deny the allegations contained in paragraph 222 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

201. The Answering Defendants deny the allegations contained in paragraph 223 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

202. The Answering Defendants deny the allegations contained in paragraph 224 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

203. The Answering Defendants deny the allegations contained in paragraph 225 of the

Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

204. The Answering Defendants deny the allegations contained in paragraph 226 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

205. The Answering Defendants deny the allegations contained in paragraph 227 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

206. The Answering Defendants deny the allegations contained in paragraph 228 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

207. The Answering Defendants deny the allegations contained in paragraph 229 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

208. The Answering Defendants deny the allegations contained in paragraph 230 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

209. The Answering Defendants deny the allegations contained in paragraph 231 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations

contained in this paragraph.

210. The Answering Defendants deny the allegations contained in paragraph 232 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

211. The Answering Defendants deny the allegations contained in paragraph 233 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

212. The Answering Defendants deny the allegations contained in paragraph 234 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

213. The Answering Defendants deny the allegations contained in paragraph 235 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

214. The Answering Defendants deny the allegations contained in paragraph 236 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

215. The Answering Defendants neither admit nor deny the allegations contained in paragraph 237 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

216. The Answering Defendants neither admit nor deny the allegations contained in paragraph 238 of the Plaintiffs' Complaint as the allegations purport to expound and interpret

medical, scientific and/or clinical information and guidelines.

217. The Answering Defendants neither admit nor deny the allegations contained in paragraph 239 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

218. The Answering Defendants deny the allegations contained in paragraph 240 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

219. The Answering Defendants deny the allegations contained in paragraph 241 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

220. The Answering Defendants deny the allegations contained in paragraph 242 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

221. The Answering Defendants deny the allegations contained in paragraph 243 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

222. The Answering Defendants deny the allegations contained in paragraph 244 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

223. The Answering Defendants neither admit nor deny the allegations contained in paragraph 245 of the Plaintiffs' Complaint as the allegations purport to expound and interpret

medical, scientific and/or clinical information and guidelines.

224. The Answering Defendants neither admit nor deny the allegations contained in paragraph 246 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

225. The Answering Defendants neither admit nor deny the allegations contained in paragraph 247 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

226. The Answering Defendants deny the allegations contained in paragraph 248 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

227. The Answering Defendants deny the allegations contained in paragraph 249 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

228. The Answering Defendants deny the allegations contained in paragraph 250 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

229. The Answering Defendants deny the allegations contained in paragraph 251 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

230. The Answering Defendants deny the allegations contained in paragraph 252 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations

contained in this paragraph.

231. The Answering Defendants deny the allegations contained in paragraph 253 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

232. The Answering Defendants deny the allegations contained in paragraph 254 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

233. The Answering Defendants deny the allegations contained in paragraph 255 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

234. The Answering Defendants deny the allegations contained in paragraph 256 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

235. The Answering Defendants deny the allegations contained in paragraph 257 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

236. The Answering Defendants deny the allegations contained in paragraph 258 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

237. The Answering Defendants deny the allegations contained in paragraph 259 of the

Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

238. The Answering Defendants deny the allegations contained in paragraph 260 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

239. The Answering Defendants deny the allegations contained in paragraph 261 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

240. The Answering Defendants deny the allegations contained in paragraph 262 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

241. The Answering Defendants deny the allegations contained in paragraph 263 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

242. The Answering Defendants neither admit or deny the allegations contained in paragraph 264 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

243. The Answering Defendants neither admit or deny the allegations contained in paragraph 265 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee

Schedule.

244. The Answering Defendants neither admit or deny the allegations contained in paragraph 266 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

245. The Answering Defendants neither admit nor deny the allegations contained in paragraph 267 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule

246. The Answering Defendants deny the allegations contained in paragraph 268 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

247. The Answering Defendants deny the allegations contained in paragraph 269 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

248. The Answering Defendants deny the allegations contained in paragraph 270 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

249. The Answering Defendants deny the allegations contained in paragraph 271 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

250. The Answering Defendants deny the allegations contained in paragraph 272 of the



Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

251. The Answering Defendants deny the allegations contained in paragraph 273 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

252. The Answering Defendants deny the allegations contained in paragraph 274 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

253. The Answering Defendants deny the allegations contained in paragraph 275 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

254. The Answering Defendants deny the allegations contained in paragraph 276 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

255. The Answering Defendants deny the allegations contained in paragraph 277 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

256. The Answering Defendants deny the allegations contained in paragraph 278 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations

contained in this paragraph.

257. The Answering Defendants deny the allegations contained in paragraph 279 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

258. The Answering Defendants deny the allegations contained in paragraph 280 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

259. The Answering Defendants deny the allegations contained in paragraph 281 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

260. The Answering Defendants deny the allegations contained in paragraph 282 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

261. The Answering Defendants deny the allegations contained in paragraph 283 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

262. The Answering Defendants deny the allegations contained in paragraph 284 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

263. The Answering Defendants deny the allegations contained in paragraph 285 of the

Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

264. The Answering Defendants deny the allegations contained in paragraph 286 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

265. The Answering Defendants deny the allegations contained in paragraph 287 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

266. The Answering Defendants deny the allegations contained in paragraph 288 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

267. The Answering Defendants deny the allegations contained in paragraph 289 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

268. The Answering Defendants deny the allegations contained in paragraph 290 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

269. The Answering Defendants deny the allegations contained in paragraph 291 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations

contained in this paragraph.

270. The Answering Defendants deny the allegations contained in paragraph 292 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

271. The Answering Defendants deny the allegations contained in paragraph 293 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

272. The Answering Defendants deny the allegations contained in paragraph 294 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

273. The Answering Defendants deny the allegations contained in paragraph 295 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

274. The Answering Defendants deny the allegations contained in paragraph 296 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

275. The Answering Defendants deny the allegations contained in paragraph 297 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

276. The Answering Defendants deny the allegations contained in paragraph 298 of the

Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

277. The Answering Defendants deny the allegations contained in paragraph 299 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

278. The Answering Defendants deny the allegations contained in paragraph 300 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

279. The Answering Defendants neither admit nor deny the allegations contained in paragraph 301 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

280. The Answering Defendants deny the allegations contained in paragraph 302 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

281. The Answering Defendants deny the allegations contained in paragraph 303 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

282. The Answering Defendants deny the allegations contained in paragraph 304 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations

contained in this paragraph.

283. The Answering Defendants neither admit nor deny the allegations contained in paragraph 305 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

284. The Answering Defendants deny the allegations contained in paragraph 306 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

285. The Answering Defendants deny the allegations contained in paragraph 307 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

286. The Answering Defendants deny the allegations contained in paragraph 308 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

287. The Answering Defendants neither admit nor deny the allegations contained in paragraph 309 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

288. The Answering Defendants neither admit nor deny the allegations contained in paragraph 310 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

289. The Answering Defendants neither admit nor deny the allegations contained in

paragraph 311 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

290. The Answering Defendants deny the allegations contained in paragraph 312 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

291. The Answering Defendants deny the allegations contained in paragraph 313 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

292. The Answering Defendants neither admit nor deny the allegations contained in paragraph 314 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

293. The Answering Defendants deny the allegations contained in paragraph 315 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

294. The Answering Defendants deny the allegations contained in paragraph 316 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

295. The Answering Defendants deny the allegations contained in paragraph 317 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

296. The Answering Defendants deny the allegations contained in paragraph 318 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

297. The Answering Defendants neither admit nor deny the allegations contained in paragraph 319 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

298. The Answering Defendants deny the allegations contained in paragraph 320 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

299. The Answering Defendants deny the allegations contained in paragraph 321 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

300. The Answering Defendants deny the allegations contained in paragraph 322 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

301. The Answering Defendants neither admit nor deny the allegations contained in paragraph 323 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

302. The Answering Defendants deny the allegations contained in paragraph 324 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations



contained in this paragraph.

303. The Answering Defendants deny the allegations contained in paragraph 325 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

304. The Answering Defendants deny the allegations contained in paragraph 326 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

305. The Answering Defendants neither admit nor deny the allegations contained in paragraph 327 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

306. The Answering Defendants neither admit nor deny the allegations contained in paragraph 328 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

307. The Answering Defendants deny the allegations contained in paragraph 329 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

308. The Answering Defendants neither admit nor deny the allegations contained in paragraph 330 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

309. The Answering Defendants deny the allegations contained in paragraph 331 of the

Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

310. The Answering Defendants neither admit nor deny the allegations contained in paragraph 332 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

311. The Answering Defendants deny the allegations contained in paragraph 333 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

312. The Answering Defendants neither admit nor deny the allegations contained in paragraph 334 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

313. The Answering Defendants deny the allegations contained in paragraph 335 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

314. The Answering Defendants deny the allegations contained in paragraph 336 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

315. The Answering Defendants deny the allegations contained in paragraph 337 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

316. The Answering Defendants neither admit nor deny the allegations contained in paragraph 338 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

317. The Answering Defendants deny the allegations contained in paragraph 339 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

318. The Answering Defendants deny the allegations contained in paragraph 340 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

319. The Answering Defendants deny the allegations contained in paragraph 341 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

320. The Answering Defendants deny the allegations contained in paragraph 342 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

321. The Answering Defendants deny the allegations contained in paragraph 343 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

322. The Answering Defendants deny the allegations contained in paragraph 344 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering

Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

323. The Answering Defendants deny the allegations contained in paragraph 345 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

324. The Answering Defendants deny the allegations contained in paragraph 346 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

325. The Answering Defendants deny the allegations contained in paragraph 347 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

326. The Answering Defendants deny the allegations contained in paragraph 348 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

327. The Answering Defendants deny the allegations contained in paragraph 349 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

328. The Answering Defendants deny the allegations contained in paragraph 350 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

329. The Answering Defendants deny the allegations contained in paragraph 351 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

330. The Answering Defendants deny the allegations contained in paragraph 352 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

331. The Answering Defendants deny the allegations contained in paragraph 353 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

332. The Answering Defendants deny the allegations contained in paragraph 354 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

333. The Answering Defendants deny the allegations contained in paragraph 355 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

334. The Answering Defendants deny the allegations contained in paragraph 356 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

335. The Answering Defendants neither admit nor deny the allegations contained in paragraph 357 of the Plaintiffs' Complaint as the allegations purport to expound and interpret

medical, scientific and/or clinical information and guidelines.

336. The Answering Defendants deny the allegations contained in paragraph 358 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

337. The Answering Defendants deny the allegations contained in paragraph 359 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

338. The Answering Defendants deny the allegations contained in paragraph 360 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

339. The Answering Defendants deny the allegations contained in paragraph 361 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

340. The Answering Defendants deny the allegations contained in paragraph 362 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

341. The Answering Defendants deny the allegations contained in paragraph 363 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

342. The Answering Defendants deny the allegations contained in paragraph 364 of the

Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

343. The Answering Defendants neither admit nor deny the allegations contained in paragraph 365 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

344. The Answering Defendants deny the allegations contained in paragraph 366 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

345. The Answering Defendants deny the allegations contained in paragraph 367 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

346. The Answering Defendants neither admit nor deny the allegations contained in paragraph 368 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

347. The Answering Defendants neither admit nor deny the allegations contained in paragraph 369 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

348. The Answering Defendants neither admit nor deny the allegations contained in paragraph 370 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

349. The Answering Defendants deny the allegations contained in paragraph 371 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

350. The Answering Defendants deny the allegations contained in paragraph 372 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph

351. The Answering Defendants deny the allegations contained in paragraph 373 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph

352. The Answering Defendants deny the allegations contained in paragraph 374 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph

353. The Answering Defendants neither admit nor deny the allegations contained in paragraph 375 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

354. The Answering Defendants deny the allegations contained in paragraph 376 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

355. The Answering Defendants neither admit nor deny the allegations contained in paragraph 377 of the Plaintiffs' Complaint as the allegations purport to interpret New York State



Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

356. The Answering Defendants deny the allegations contained in paragraph 378 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

357. The Answering Defendants neither admit nor deny the allegations contained in paragraph 379 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

358. The Answering Defendants deny the allegations contained in paragraph 380 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

359. The Answering Defendants neither admit nor deny the allegations contained in paragraph 381 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

360. The Answering Defendants deny the allegations contained in paragraph 382 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

361. The Answering Defendants deny the allegations contained in paragraph 383 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

362. The Answering Defendants deny the allegations contained in paragraph 384 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

363. The Answering Defendants deny the allegations contained in paragraph 385 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

364. The Answering Defendants deny the allegations contained in paragraph 386 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

365. The Answering Defendants deny the allegations contained in paragraph 387 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

366. The Answering Defendants deny the allegations contained in paragraph 388 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

367. The Answering Defendants deny the allegations contained in paragraph 389 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

368. The Answering Defendants deny the allegations contained in paragraph 390 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering

Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

369. The Answering Defendants deny the allegations contained in paragraph 391 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

370. The Answering Defendants deny the allegations contained in paragraph 392 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

371. The Answering Defendants deny the allegations contained in paragraph 393 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

372. The Answering Defendants deny the allegations contained in paragraph 394 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

373. The Answering Defendants deny the allegations contained in paragraph 395 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

374. The Answering Defendants deny the allegations contained in paragraph 396 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

375. The Answering Defendants deny the allegations contained in paragraph 397 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

376. The Answering Defendants neither admit nor deny the allegations contained in paragraph 398 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

377. The Answering Defendants neither admit nor deny the allegations contained in paragraph 399 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

378. The Answering Defendants neither admit nor deny the allegations contained in paragraph 400 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

379. The Answering Defendants deny the allegations contained in paragraph 401 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

380. The Answering Defendants neither admit nor deny the allegations contained in paragraph 402 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

381. The Answering Defendants neither admit nor deny the allegations contained in paragraph 403 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

382. The Answering Defendants neither admit nor deny the allegations contained in paragraph 404 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

383. The Answering Defendants neither admit nor deny the allegations contained in paragraph 405 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

384. The Answering Defendants neither admit nor deny the allegations contained in paragraph 406 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

385. The Answering Defendants neither admit nor deny the allegations contained in paragraph 407 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

386. The Answering Defendants neither admit nor deny the allegations contained in paragraph 408 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

387. The Answering Defendants neither admit nor deny the allegations contained in paragraph 409 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

388. The Answering Defendants neither admit nor deny the allegations contained in paragraph 410 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

389. The Answering Defendants neither admit nor deny the allegations contained in paragraph 411 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

390. The Answering Defendants deny the allegations contained in paragraph 412 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

391. The Answering Defendants deny the allegations contained in paragraph 413 of the

Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

392. The Answering Defendants deny the allegations contained in paragraph 414 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

393. The Answering Defendants deny the allegations contained in paragraph 415 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

394. The Answering Defendants deny the allegations contained in paragraph 416 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

395. The Answering Defendants neither admit nor deny the allegations contained in paragraph 417 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

396. The Answering Defendants neither admit nor deny the allegations contained in paragraph 418 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

397. The Answering Defendants neither admit nor deny the allegations contained in paragraph 419 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines

398. The Answering Defendants deny the allegations contained in paragraph 420 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering

Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

399. The Answering Defendants deny the allegations contained in paragraph 421 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

400. The Answering Defendants deny the allegations contained in paragraph 422 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

401. The Answering Defendants deny the allegations contained in paragraph 423 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

402. The Answering Defendants deny the allegations contained in paragraph 424 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

403. The Answering Defendants deny the allegations contained in paragraph 425 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

404. The Answering Defendants neither admit nor deny the allegations contained in paragraph 426 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

405. The Answering Defendants neither admit nor deny the allegations contained in

paragraph 427 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

406. The Answering Defendants deny the allegations contained in paragraph 428 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

407. The Answering Defendants deny the allegations contained in paragraph 429 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

408. The Answering Defendants deny the allegations contained in paragraph 430 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

409. The Answering Defendants neither admit nor deny the allegations contained in paragraph 431 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

410. The Answering Defendants deny the allegations contained in paragraph 432 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

411. The Answering Defendants deny the allegations contained in paragraph 433 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.



412. The Answering Defendants deny the allegations contained in paragraph 434 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

413. The Answering Defendants deny the allegations contained in paragraph 435 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

414. The Answering Defendants deny the allegations contained in paragraph 436 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

415. The Answering Defendants neither admit nor deny the allegations contained in paragraph 437 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

416. The Answering Defendants neither admit nor deny the allegations contained in paragraph 438 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

417. The Answering Defendants deny the allegations contained in paragraph 439 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

418. The Answering Defendants deny the allegations contained in paragraph 440 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

419. The Answering Defendants deny the allegations contained in paragraph 441 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

420. The Answering Defendants deny the allegations contained in paragraph 442 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

421. The Answering Defendants deny the allegations contained in paragraph 443 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

422. The Answering Defendants deny the allegations contained in paragraph 444 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

423. The Answering Defendants deny the allegations contained in paragraph 445 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

424. The Answering Defendants deny the allegations contained in paragraph 446 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

425. The Answering Defendants deny the allegations contained in paragraph 447 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering

Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

426. The Answering Defendants deny the allegations contained in paragraph 448 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

427. The Answering Defendants deny the allegations contained in paragraph 449 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

428. The Answering Defendants deny the allegations contained in paragraph 450 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

429. The Answering Defendants deny the allegations contained in paragraph 451 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

430. The Answering Defendants deny the allegations contained in paragraph 452 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

431. The Answering Defendants deny the allegations contained in paragraph 453 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

432. The Answering Defendants deny the allegations contained in paragraph 454 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

433. The Answering Defendants deny the allegations contained in paragraph 455 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

434. The Answering Defendants deny the allegations contained in paragraph 456 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

435. The Answering Defendants deny the allegations contained in paragraph 457 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

436. The Answering Defendants deny the allegations contained in paragraph 458 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

437. The Answering Defendants deny the allegations contained in paragraph 459 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

438. The Answering Defendants deny the allegations contained in paragraph 460 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering

Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

439. The Answering Defendants deny the allegations contained in paragraph 461 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

440. The Answering Defendants neither admit nor deny the allegations contained in paragraph 462 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

441. The Answering Defendants deny the allegations contained in paragraph 463 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

442. The Answering Defendants deny the allegations contained in paragraph 464 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

443. The Answering Defendants deny the allegations contained in paragraph 465 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

444. The Answering Defendants neither admit nor deny the allegations contained in paragraph 466 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

445. The Answering Defendants deny the allegations contained in paragraph 467 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

446. The Answering Defendants deny the allegations contained in paragraph 468 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

447. The Answering Defendants deny the allegations contained in paragraph 469 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

448. The Answering Defendants deny the allegations contained in paragraph 470 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

449. The Answering Defendants deny the allegations contained in paragraph 471 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

450. The Answering Defendants deny the allegations contained in paragraph 472 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

451. The Answering Defendants deny the allegations contained in paragraph 473 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering

Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

452. The Answering Defendants deny the allegations contained in paragraph 474 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

453. The Answering Defendants deny the allegations contained in paragraph 475 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

454. The Answering Defendants deny the allegations contained in paragraph 476 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

455. The Answering Defendants deny the allegations contained in paragraph 477 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

456. The Answering Defendants deny the allegations contained in paragraph 478 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

457. The Answering Defendants deny the allegations contained in paragraph 479 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

458. The Answering Defendants deny the allegations contained in paragraph 480 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

459. The Answering Defendants deny the allegations contained in paragraph 481 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

460. The Answering Defendants deny the allegations contained in paragraph 482 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

461. The Answering Defendants deny the allegations contained in paragraph 483 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

462. The Answering Defendants deny the allegations contained in paragraph 484 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

463. The Answering Defendants deny the allegations contained in paragraph 485 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

464. The Answering Defendants deny the allegations contained in paragraph 486 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering



Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

465. The Answering Defendants deny the allegations contained in paragraph 487 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

466. The Answering Defendants deny the allegations contained in paragraph 488 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

467. The Answering Defendants deny the allegations contained in paragraph 489 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

468. The Answering Defendants deny the allegations contained in paragraph 490 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

469. The Answering Defendants deny the allegations contained in paragraph 491 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

470. The Answering Defendants deny the allegations contained in paragraph 492 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

471. The Answering Defendants deny the allegations contained in paragraph 493 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

472. The Answering Defendants deny the allegations contained in paragraph 494 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

473. The Answering Defendants deny the allegations contained in paragraph 495 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

474. The Answering Defendants deny the allegations contained in paragraph 496 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

475. The Answering Defendants deny the allegations contained in paragraph 497 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

476. The Answering Defendants deny the allegations contained in paragraph 498 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

477. The Answering Defendants neither admit nor deny the allegations contained in paragraph 499 of the Plaintiffs' Complaint as the allegations purport to expound and interpret

medical, scientific and/or clinical information and guidelines.

478. The Answering Defendants neither admit nor deny the allegations contained in paragraph 500 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

479. The Answering Defendants neither admit nor deny the allegations contained in paragraph 501 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

480. The Answering Defendants neither admit nor deny the allegations contained in paragraph 502 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

481. The Answering Defendants neither admit nor deny the allegations contained in paragraph 503 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

482. The Answering Defendants neither admit nor deny the allegations contained in paragraph 504 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

483. The Answering Defendants neither admit nor deny the allegations contained in paragraph 505 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

484. The Answering Defendants neither admit nor deny the allegations contained in paragraph 506 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

485. The Answering Defendants deny the allegations contained in paragraph 507 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

486. The Answering Defendants deny the allegations contained in paragraph 508 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

487. The Answering Defendants deny the allegations contained in paragraph 509 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

488. The Answering Defendants deny the allegations contained in paragraph 510 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

489. The Answering Defendants deny the allegations contained in paragraph 511 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

490. The Answering Defendants deny the allegations contained in paragraph 512 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

491. The Answering Defendants deny the allegations contained in paragraph 513 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

492. The Answering Defendants deny the allegations contained in paragraph 514 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering

Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

493. The Answering Defendants deny the allegations contained in paragraph 515 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

494. The Answering Defendants deny the allegations contained in paragraph 516 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

495. The Answering Defendants deny the allegations contained in paragraph 517 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

496. The Answering Defendants deny the allegations contained in paragraph 518 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

497. The Answering Defendants deny the allegations contained in paragraph 519 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

498. The Answering Defendants deny the allegations contained in paragraph 520 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

499. The Answering Defendants deny the allegations contained in paragraph 521 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

500. The Answering Defendants neither admit nor deny the allegations contained in paragraph 522 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

501. The Answering Defendants deny the allegations contained in paragraph 523 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

502. The Answering Defendants deny the allegations contained in paragraph 524 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

503. The Answering Defendants deny the allegations contained in paragraph 525 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

504. The Answering Defendants deny the allegations contained in paragraph 526 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

505. The Answering Defendants deny the allegations contained in paragraph 527 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering

Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

506. The Answering Defendants deny the allegations contained in paragraph 528 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

507. The Answering Defendants deny the allegations contained in paragraph 529 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

508. The Answering Defendants neither admit nor deny the allegations contained in paragraph 530 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

509. The Answering Defendants deny the allegations contained in paragraph 531 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

510. The Answering Defendants deny the allegations contained in paragraph 532 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

511. The Answering Defendants deny the allegations contained in paragraph 533 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

512. The Answering Defendants neither admit nor deny the allegations contained in

paragraph 534 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

513. The Answering Defendants deny the allegations contained in paragraph 535 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

514. The Answering Defendants neither admit nor deny the allegations contained in paragraph 536 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

515. The Answering Defendants deny the allegations contained in paragraph 537 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

516. The Answering Defendants deny the allegations contained in paragraph 538 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

517. The Answering Defendants deny the allegations contained in paragraph 539 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

518. The Answering Defendants deny the allegations contained in paragraph 540 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.



519. The Answering Defendants deny the allegations contained in paragraph 541 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

520. The Answering Defendants neither admit nor deny the allegations contained in paragraph 542 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

521. The Answering Defendants deny the allegations contained in paragraph 543 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

522. The Answering Defendants deny the allegations contained in paragraph 544 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

523. The Answering Defendants deny the allegations contained in paragraph 545 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

524. The Answering Defendants deny the allegations contained in paragraph 546 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

525. The Answering Defendants deny the allegations contained in paragraph 547 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering

Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

526. The Answering Defendants deny the allegations contained in paragraph 548 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

527. The Answering Defendants deny the allegations contained in paragraph 549 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

528. The Answering Defendants deny the allegations contained in paragraph 550 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

529. The Answering Defendants neither admit nor deny the allegations contained in paragraph 551 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

530. The Answering Defendants deny the allegations contained in paragraph 552 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

531. The Answering Defendants neither admit nor deny the allegations contained in paragraph 553 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

532. The Answering Defendants deny the allegations contained in paragraph 554 of the

Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

533. The Answering Defendants deny the allegations contained in paragraph 555 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

534. The Answering Defendants deny the allegations contained in paragraph 556 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

535. The Answering Defendants deny the allegations contained in paragraph 557 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

536. The Answering Defendants neither admit nor deny the allegations contained in paragraph 558 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

537. The Answering Defendants deny the allegations contained in paragraph 559 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

538. The Answering Defendants deny the allegations contained in paragraph 560 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations

contained in this paragraph.

539. The Answering Defendants deny the allegations contained in paragraph 561 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

540. The Answering Defendants deny the allegations contained in paragraph 562 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

541. The Answering Defendants deny the allegations contained in paragraph 563 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

542. The Answering Defendants deny the allegations contained in paragraph 564 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

543. The Answering Defendants deny the allegations contained in paragraph 565 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

544. The Answering Defendants deny the allegations contained in paragraph 566 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

545. The Answering Defendants deny the allegations contained in paragraph 567 of the

Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

546. The Answering Defendants deny the allegations contained in paragraph 568 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

547. The Answering Defendants deny the allegations contained in paragraph 569 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

548. The Answering Defendants deny the allegations contained in paragraph 570 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

549. The Answering Defendants deny the allegations contained in paragraph 571 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

550. The Answering Defendants deny the allegations contained in paragraph 572 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

551. The Answering Defendants deny the allegations contained in paragraph 573 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations

contained in this paragraph.

552. The Answering Defendants deny the allegations contained in paragraph 574 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

553. The Answering Defendants deny the allegations contained in paragraph 575 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

554. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 576 of Plaintiffs' Complaint.

555. The Answering Defendants deny the allegations contained in paragraph 577 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

556. The Answering Defendants deny the allegations contained in paragraph 578 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

557. The Answering Defendants deny the allegations contained in paragraph 579 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

558. The Answering Defendants deny the allegations contained in paragraph 580 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations

contained in this paragraph.

559. The Answering Defendants deny the allegations contained in paragraph 581 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

560. The Answering Defendants deny the allegations contained in paragraph 582 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

561. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 583 of Plaintiffs' Complaint.

562. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 584 of Plaintiffs' Complaint.

**RESPONSE TO FIRST CAUSE OF ACTION**

563. As to paragraph 585, the Answering Defendants incorporate, as though fully set forth therein, each and every answer set forth in the foregoing paragraphs.

564. The Answering Defendants deny the allegations contained in paragraph 586 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

565. The Answering Defendants deny the allegations contained in paragraph 587 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

566. The Answering Defendants deny the allegations contained in paragraph 588 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering

Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

567. The Answering Defendants deny the allegations contained in paragraph 589 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

568. The Answering Defendants deny the allegations contained in paragraph 590 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

#### **RESPONSE TO SECOND CAUSE OF ACTION**

569. As to paragraph 591, the Answering Defendants incorporate, as though fully set forth therein, each and every answer set forth in the foregoing paragraphs.

570. The Answering Defendants deny the allegations contained in paragraph 592 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

571. The Answering Defendants deny the allegations contained in paragraph 593 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

572. The Answering Defendants deny the allegations contained in paragraph 594 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

573. The Answering Defendants deny the allegations contained in paragraph 595 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

574. The Answering Defendants deny the allegations contained in paragraph 596 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

575. The Answering Defendants deny the allegations contained in paragraph 597 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

#### **RESPONSE TO THIRD CAUSE OF ACTION**



576. As to paragraph 598, the Answering Defendants incorporate, as though fully set forth therein, each and every answer set forth in the foregoing paragraphs.

577. The Answering Defendants deny the allegations contained in paragraph 599 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

578. The Answering Defendants deny the allegations contained in paragraph 600 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

579. The Answering Defendants deny the allegations contained in paragraph 601 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

580. The Answering Defendants deny the allegations contained in paragraph 602 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

581. The Answering Defendants deny the allegations contained in paragraph 603 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

582. The Answering Defendants deny the allegations contained in paragraph 604 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

#### **RESPONSE TO FOURTH CAUSE OF ACTION**

583. As to paragraph 605, the Answering Defendants incorporate, as though fully set forth therein, each and every answer set forth in the foregoing paragraphs.

584. The Answering Defendants deny the allegations contained in paragraph 606 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

585. The Answering Defendants deny the allegations contained in paragraph 607 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

586. The Answering Defendants deny the allegations contained in paragraph 608 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

587. The Answering Defendants deny the allegations contained in paragraph 609 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

588. The Answering Defendants deny the allegations contained in paragraph 610 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants.

**RESPONSE TO FIFTH CAUSE OF ACTION**

589. As to paragraph 611, the Answering Defendants incorporate, as though fully set forth therein, each and every answer set forth in the foregoing paragraphs.

590. The Answering Defendants deny the allegations contained in paragraph 612 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

591. The Answering Defendants deny the allegations contained in paragraph 613 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

592. The Answering Defendants deny the allegations contained in paragraph 614 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

593. The Answering Defendants deny the allegations contained in paragraph 615 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

594. The Answering Defendants deny the allegations contained in paragraph 616 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

595. The Answering Defendants deny the allegations contained in paragraph 617 of the

Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

**RESPONSE TO SIXTH CAUSE OF ACTION**

596. As to paragraph 618, the Answering Defendants incorporate, as though fully set forth therein, each and every answer set forth in the foregoing paragraphs.

597. The Answering Defendants deny the allegations contained in paragraph 619 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

598. The Answering Defendants deny the allegations contained in paragraph 620 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

599. The Answering Defendants deny the allegations contained in paragraph 621 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

600. The Answering Defendants deny the allegations contained in paragraph 622 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

601. The Answering Defendants deny the allegations contained in paragraph 623 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

602. The Answering Defendants deny the allegations contained in paragraph 624 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

**RESPONSE TO SEVENTH CAUSE OF ACTION**

603. As to paragraph 625, the Answering Defendants incorporate, as though fully set forth therein, each and every answer set forth in the foregoing paragraphs.

604. The Answering Defendants deny the allegations contained in paragraph 626 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

605. The Answering Defendants deny the allegations contained in paragraph 627 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

606. The Answering Defendants deny the allegations contained in paragraph 628 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

607. The Answering Defendants deny the allegations contained in paragraph 629 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

608. The Answering Defendants deny the allegations contained in paragraph 630 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations

contained in this paragraph.

**RESPONSE TO EIGHT CAUSE OF ACTION**

609. As to paragraph 631, the Answering Defendants incorporate, as though fully set forth therein, each and every answer set forth in the foregoing paragraphs.

610. The Answering Defendants deny the allegations contained in paragraph 632 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

611. The Answering Defendants deny the allegations contained in paragraph 633 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

612. The Answering Defendants deny the allegations contained in paragraph 634 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

613. The Answering Defendants deny the allegations contained in paragraph 635 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

614. The Answering Defendants deny the allegations contained in paragraph 636 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

615. The Answering Defendants deny the allegations contained in paragraph 637 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering

Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

**RESPONSE TO NINTH CAUSE OF ACTION**

616. As to paragraph 638, the Answering Defendants incorporate, as though fully set forth therein, each and every answer set forth in the foregoing paragraphs.

617. The Answering Defendants deny the allegations contained in paragraph 639 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

618. The Answering Defendants deny the allegations contained in paragraph 640 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

619. The Answering Defendants deny the allegations contained in paragraph 641 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

620. The Answering Defendants deny the allegations contained in paragraph 642 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

621. The Answering Defendants deny the allegations contained in paragraph 643 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

622. The Answering Defendants deny the allegations contained in paragraph 644 of the

Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

**RESPONSE TO TENTH CAUSE OF ACTION**

623. As to paragraph 645, the Answering Defendants incorporate, as though fully set forth therein, each and every answer set forth in the foregoing paragraphs.

624. The Answering Defendants deny the allegations contained in paragraph 646 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

625. The Answering Defendants deny the allegations contained in paragraph 647 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

626. The Answering Defendants deny the allegations contained in paragraph 648 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

627. The Answering Defendants deny the allegations contained in paragraph 649 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

628. The Answering Defendants deny the allegations contained in paragraph 650 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

**RESPONSE TO ELEVENTH CAUSE OF ACTION**

629. As to paragraph 651, the Answering Defendants incorporate, as though fully set forth therein, each and every answer set forth in the foregoing paragraphs.

630. The Answering Defendants deny the allegations contained in paragraph 652 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

631. The Answering Defendants deny the allegations contained in paragraph 653 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

632. The Answering Defendants deny the allegations contained in paragraph 654 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

633. The Answering Defendants deny the allegations contained in paragraph 655 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

634. The Answering Defendants deny the allegations contained in paragraph 656 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

635. The Answering Defendants deny the allegations contained in paragraph 657 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations



contained in this paragraph.

**RESPONSE TO TWELFTH CAUSE OF ACTION**

636. As to paragraph 658, the Answering Defendants incorporate, as though fully set forth therein, each and every answer set forth in the foregoing paragraphs.

637. The Answering Defendants deny the allegations contained in paragraph 659 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

638. The Answering Defendants deny the allegations contained in paragraph 660 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

639. The Answering Defendants deny the allegations contained in paragraph 661 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

640. The Answering Defendants deny the allegations contained in paragraph 662 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

641. The Answering Defendants deny the allegations contained in paragraph 663 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

642. The Answering Defendants deny the allegations contained in paragraph 664 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering

Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

**RESPONSE TO THIRTEENTH CAUSE OF ACTION**

643. As to paragraph 665, the Answering Defendants incorporate, as though fully set forth therein, each and every answer set forth in the foregoing paragraphs.

644. The Answering Defendants deny the allegations contained in paragraph 666 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

645. The Answering Defendants deny the allegations contained in paragraph 667 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

646. The Answering Defendants deny the allegations contained in paragraph 668 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

647. The Answering Defendants deny the allegations contained in paragraph 669 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

648. The Answering Defendants deny the allegations contained in paragraph 670 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

649. The Answering Defendants deny the allegations contained in paragraph 671 of the

Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

**RESPONSE TO FOURTEENTH CAUSE OF ACTION**

650. As to paragraph 672, the Answering Defendants incorporate, as though fully set forth therein, each and every answer set forth in the foregoing paragraphs.

651. The Answering Defendants deny the allegations contained in paragraph 673 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

652. The Answering Defendants deny the allegations contained in paragraph 674 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

653. The Answering Defendants deny the allegations contained in paragraph 675 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

654. The Answering Defendants deny the allegations contained in paragraph 676 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

655. The Answering Defendants deny the allegations contained in paragraph 677 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

656. The defendants were engaged in a legally organized business for a legitimate purpose and did not defraud the plaintiffs.

**AS AND FOR A SECOND AFFIRMATIVE DEFENSE**

657. Plaintiffs defended arbitrations and litigation and the decisions in those matters serves as res judicata for those claims.

**AS AND FOR A THIRD AFFIRMATIVE DEFENSE**

658. The Plaintiffs are barred from recovery for lack of privity.

**AS AND FOR A FOURTH AFFIRMATIVE DEFENSE**

659. The Plaintiffs' Complaint is barred by the Statute of Frauds

**AS AND FOR A FIFTH AFFIRMATIVE  
DEFENSE**

660. The Plaintiffs' Complaint is barred by the Statute of Limitations.

**AS AND FOR A SIXTH AFFIRMATIVE  
DEFENSE**

661. The Plaintiffs' Complaint is barred by the doctrine of laches.

**AS AND FOR A SEVENTH AFFIRMATIVE  
DEFENSE**

662. Plaintiffs' complaint fails to state a cause of action for enterprise corruption.

**AS AND FOR AN EIGHTH AFFIRMATIVE  
DEFENSE**

663. Nothing the defendants did or failed to do constitutes a violation of 18 U.S.C. 1964 (c).

**AS AND FOR A NINTH AFFIRMATIVE  
DEFENSE**

664. The Plaintiffs are barred from recovery as they have failed to comply with the rules and regulations of the State of New York pertaining to no-fault insurance coverage.

**AS AND FOR A TENTH AFFIRMATIVE  
DEFENSE**

665. The Plaintiffs are barred from recovery as any damages suffered have been passed through to insureds through the adjustment of insurance rates as reported to the New York Insurance Department.

**AS AND FOR AN ELEVENTH AFFIRMATIVE  
DEFENSE**

666. The Plaintiffs' Complaint is barred by the doctrine of equitable estoppel.

**AS AND FOR A TWELVTH AFFIRMATIVE  
DEFENSE**

667. The Plaintiffs are barred by the doctrine of res judicata.

**AS AND FOR A THIRTEENTH AFFIRMATIVE  
DEFENSE**

668. The Plaintiffs are barred by the doctrine of collateral estoppel.

**AS AND FOR A FOURTEENTH AFFIRMATIVE  
DEFENSE**

669. The Plaintiffs are barred by the doctrine of claim preclusion.

**AS AND FOR A FIFTHTEENTH AFFIRMATIVE  
DEFENSE**

670. The Plaintiffs are barred by the doctrine of issue preclusion.

**AS AND FOR A SIXTEENTH AFFIRMATIVE  
DEFENSE**

671. The Plaintiffs cannot seek a Declaratory Judgment against the professional corporation as there is existing arbitration and litigation. The professional corporation's rights to choose forum under the NY No-fault Rules and Regulation cannot be abrogated by the Plaintiff instituting this action.

**AS AND FOR A SEVENTEENTH  
AFFIRMATIVE DEFENSE**

672. The Plaintiffs are barred by the doctrine of waiver.

**AS AND FOR AN EIGHTEENTH  
AFFIRMATIVE DEFENSE**

673. The Plaintiffs are barred by the doctrine of unclean hands.

**AS AND FOR THE FIRST CROSS-CLAIM AGAINST**  
**ALL OTHER CO-DEFENDANTS**

674. If Plaintiff suffered damages as set forth in the Plaintiff' Complaint, these damages will have been caused and brought about by reason of the carelessness, recklessness, and/or negligence; and/or acts of commission or omission; and/or breach of contract; and/or breach of warranty or other agreement; and/or strict liability of the other co-defendants.

**AS AND FOR THE SECOND CROSS-CLAIM AGAINST**  
**ALL OTHER CO-DEFENDANTS**

675. If the Plaintiff obtains a judgment against Defendants, by operation of law or otherwise, it will be entitled to judgment, contribution and/or indemnity over and against the other co-defendants, their agents, servants and/or employees, by reason of their carelessness, recklessness, and/or negligence for the amount of any such recovery, or a portion thereof, in accordance with principles of law regarding apportionment of fault and damages, along with costs, disbursements and reasonable expenses of the investigation and defense of this action, including reasonable attorneys fees.

**AS AND FOR THE THIRD CROSS-CLAIM AGAINST**  
**ALL OTHER CO-DEFENDANTS**

676. All cross-claims which have been or will be asserted by other defendants and/or any third-party defendants in this action are adopted and incorporated by reference as if fully set forth at length herein as cross-claims to the Plaintiff' Complaint. In addition, these Defendants

will rely upon any and all other further cross-claims which become available or appear during discovery proceedings in this action and hereby specifically reserve the right to amend its answer for the purposes of asserting any such additional cross-claims.

**REPLY TO CROSS-CLAIMS**

677. Defendants deny any and all cross-claims now or hereafter asserted against these Defendants; asserts all defenses including those set forth above; and avers that it is not liable to Plaintiff, to defendants, to any third-party defendant, or to any others.

**ANSWERING DEFENDANTS DEMAND A TRIAL BY JURY**

**WHEREFORE**, Defendants demand judgment as follows:

- (a) Dismissing the Plaintiff's Complaint together with the interest, costs and disbursements of this action, or judgment over, as required by law;
- (b) Awarding judgment, contribution and/or indemnity against other co-defendants for the full amount of any verdict and judgment or for a proportionate share thereof that Plaintiff may recover against Defendants, in accordance with the principles of law regarding apportionment of fault and damages, along with costs and disbursements, including reasonable attorney fees; and
- (c) For such other and further relief as this Court may deem just and proper.

Dated: August 28, 2020  
Huntington Station, New York

ZIMMERMAN LAW, P.C.

BY: Michael A. Zimmerman  
Michael A. Zimmerman (MZ2076)  
315 Walt Whitman Road, Suite 215  
Huntington Station, NY 11746  
(631) 415-0900

*Counsel for NORTHERN MEDICAL CARE, P.C.  
and OMAR F. AHMED, M.D.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 31st day of August, 2020, Defendants *NORTHERN MEDICAL CARE, P.C. and OMAR F. AHMED, M.D.* served their Answer upon all counsel of record via the Court's Electronic Filing System.

By: /s/ Michael Zimmerman  
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